

## **FY17 to FY18 Mid-Year Analysis for Regional Evaluation**

### **6/19/18**

#### **PURPOSE**

This document provides an in-depth analysis of the changes in enforcement outputs (initiations, conclusions and inspections) between mid-year FY 17 and mid-year FY 18 by programs and region. The detailed tables and charts supporting this short summary follow. Per the June 19, 2018 email from OECA's Deputy Assistant Administrator, we have asked the regions to respond to three requests: 1) verify data accuracy, 2) provide a narrative explanation for output changes of greater than or less than 10%, and 3) provide projections for your FY2018 end of year activities (see email for details).

#### **CAVEAT**

Regions are expected to enter data into ICIS within 10 business days of the event. The FY17 mid-year data should be of very high quality as the regions had 7 months after March 31, 2017 to complete and certify their data. The FY18 -mid-year data should be of good quality as the regions have had two months to complete data entry after mid-year close (March 31, 2018), but the end of year data certification process that prompts data quality reviews does not occur until October 2018.

#### **INITIATIONS**

- Between MY FY 17 and MY FY 18, there was a 24% decline in the number of initiations among all programs
- Between MY FY 17 and MY FY 18, every enforcement program had a decline in the number of initiations except SDWA PWS (65% increase).<sup>1</sup>
- The major enforcement programs saw declines as follows:
  - o CAA Stationary Source = -52%
  - o CWA NPDES = -36%
  - o RCRA HW = -17%
- From MY FY 17 to MY FY 18, every region had a decline in the number of initiations
  - o Regions 2, 6 and 9 had declines of less than 10%
  - o Regions 3 (40%), 4 (49%), and 8 (53%) had declines of at least 40%
- Overall there was a 28% decline in the number of civil judicial referrals from MY FY 17 to FY 18

#### **CONCLUSIONS**

- From MY FY 17 and MY FY 18, there was a 23% decline in conclusions among all programs which we expect would lead to a decline in outcomes, such as penalty dollars, injunctive relief and environmental benefits (assuming there is no surprise huge case).
- From MY FY 17 and MY FY 18, every enforcement program had a decline in conclusions except SDWA PWS (50% increase)
  - o The SDWA PWS increase is not consistent among all regions
- The major enforcement programs saw declines as follows:

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<sup>1</sup> There was a slight increase in PWS inspections from FY2016 to FY2017, which may partially explain the increase in enforcement actions in MY FY2108.

- CAA Stationary Source = -38%
- CWA NPDES = -38%
- RCRA HW = -23%
- Between MY FY 17 to MY FY 18, Regions 2 and 9 remained stable in the number of conclusions, while every other region had a decline of at least 14%
  - Regions 1 (42%), 3 (38%), and 4 (48%) had declines of at least 38%
- Overall there was a 21% decline in the number of civil judicial conclusions from FY 17 to FY 18

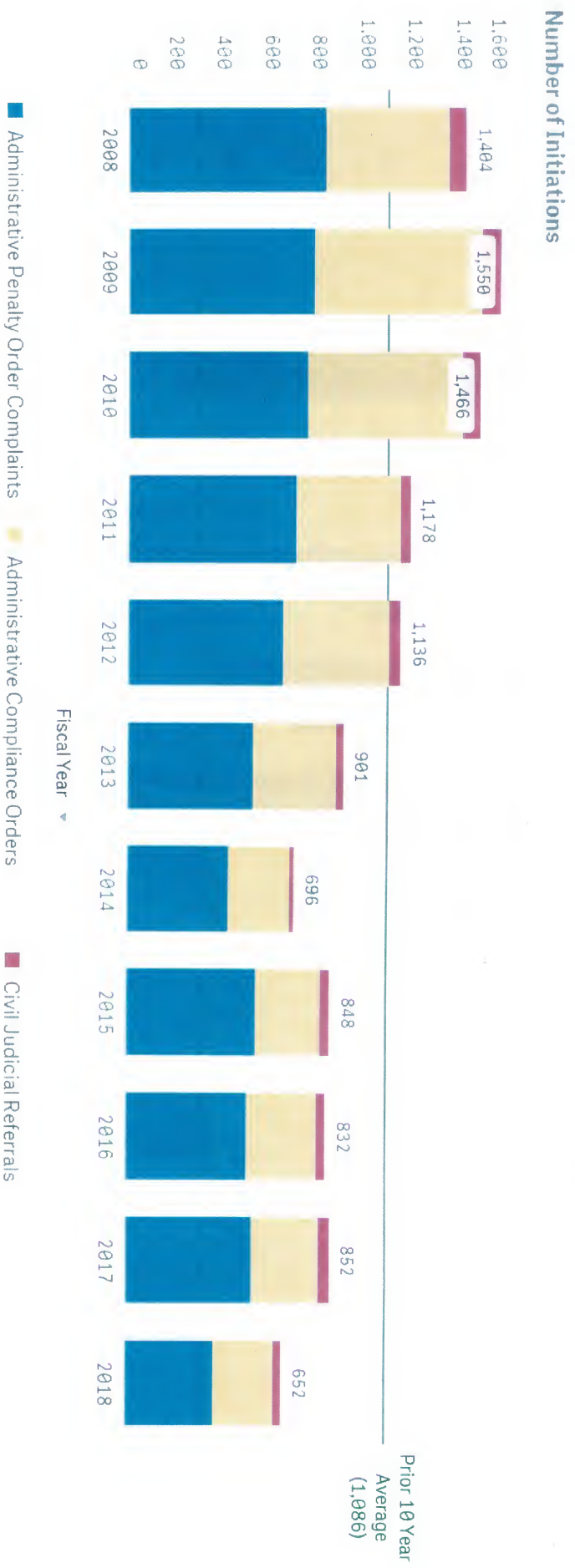
## INSPECTIONS

- Between MY FY 17 and MY FY 18, there was a 33% decline in the number of inspections among all programs (MY FY 17 = 3,747; MY FY 18 = 2,508)
- From MY FY 17 to MY FY 18, every region had a decline of at least 15% in the number of inspections
- Between MY FY 17 and MY FY 18, CAA Stationary Source Partial Compliance Evaluations (PCEs) had the largest drop in number of inspections (-469, or -68% decline)

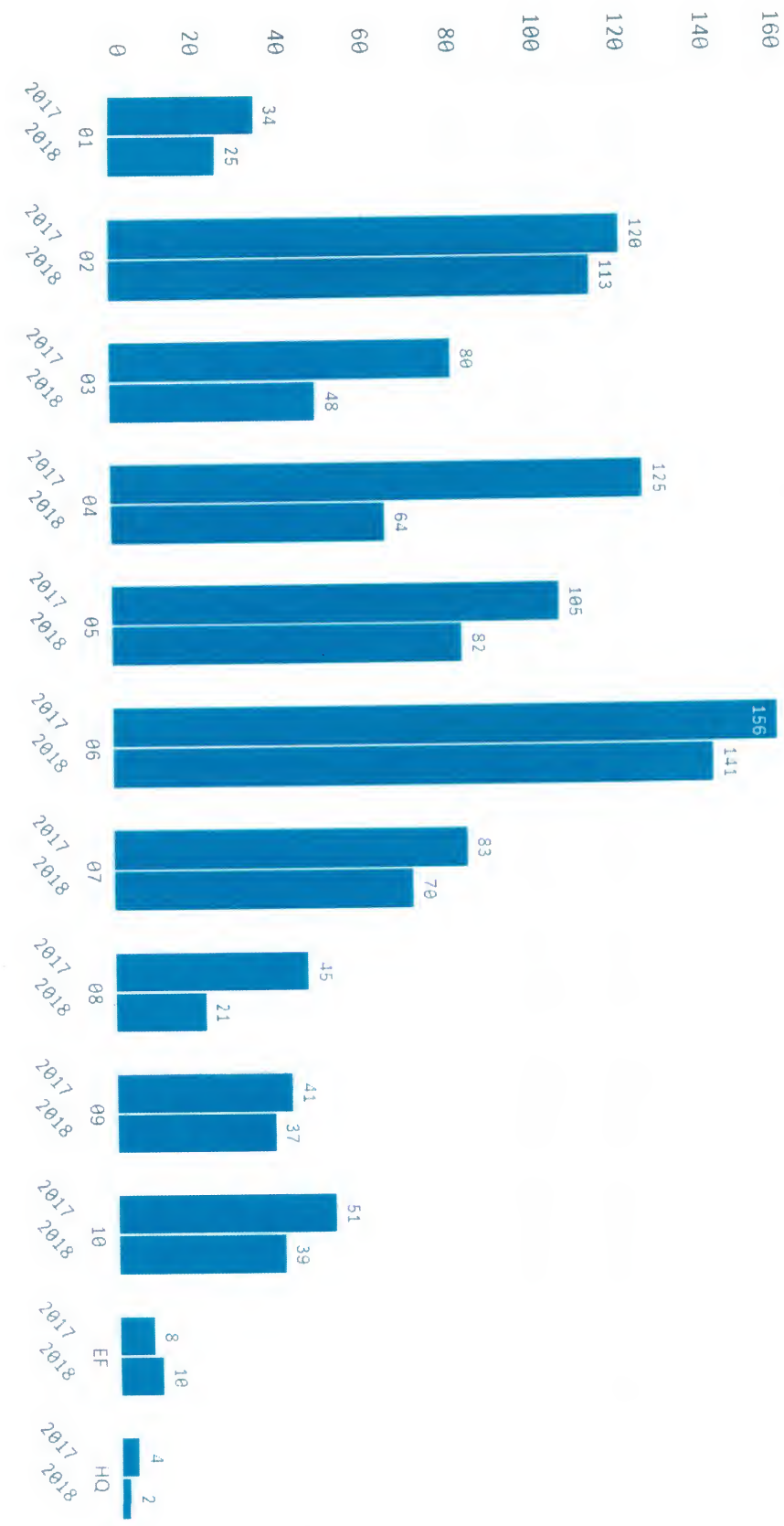
## ATTACHMENTS

- Charts:
1. Total Initiations by year: Mid-Year to Mid-Year Comparison
  2. Total Initiations by Region: Mid-Year to Mid-Year Comparison
  3. Civil Judicial referrals by Region: Mid-Year to Mid-Year Comparison
  4. Total Conclusions by Year: Mid-Year to Mid-Year Comparison
  5. Total Conclusions by Region: Mid-Year to Mid-Year Comparison
  6. Civil Judicial Conclusions by Region: Mid-Year to Mid-Year Comparison
  7. Inspections by Year: Mid-Year to Mid-Year Comparison
  8. Inspections by Region: Mid-Year to Mid-Year Comparison
- Tables:
1. National Initiations
  2. National Conclusions
  3. Conclusions by Region
  4. National Inspections
  5. Inspections by Region

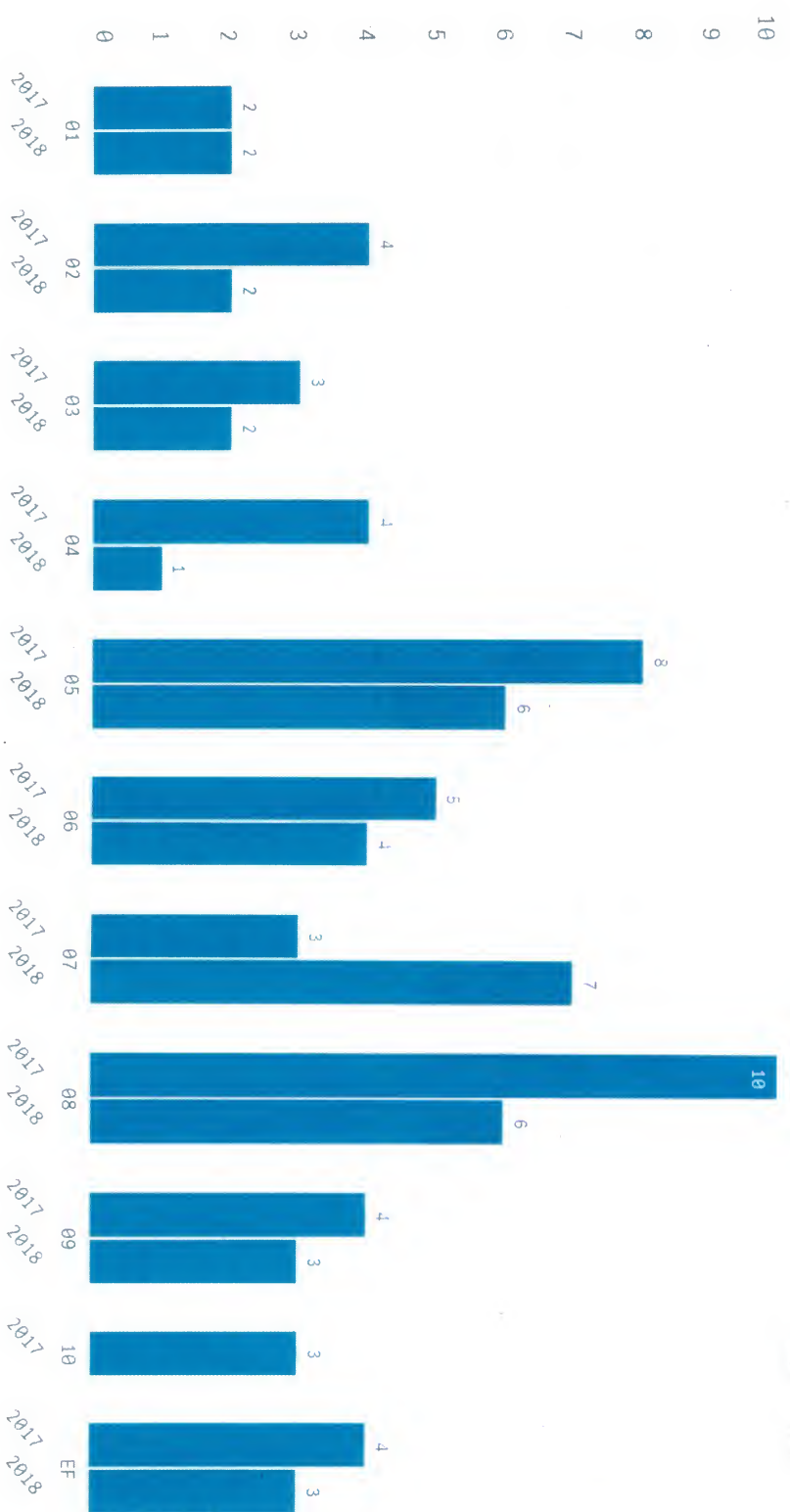
## Total Initiations by Year: Mid-Year to Mid-Year Comparison



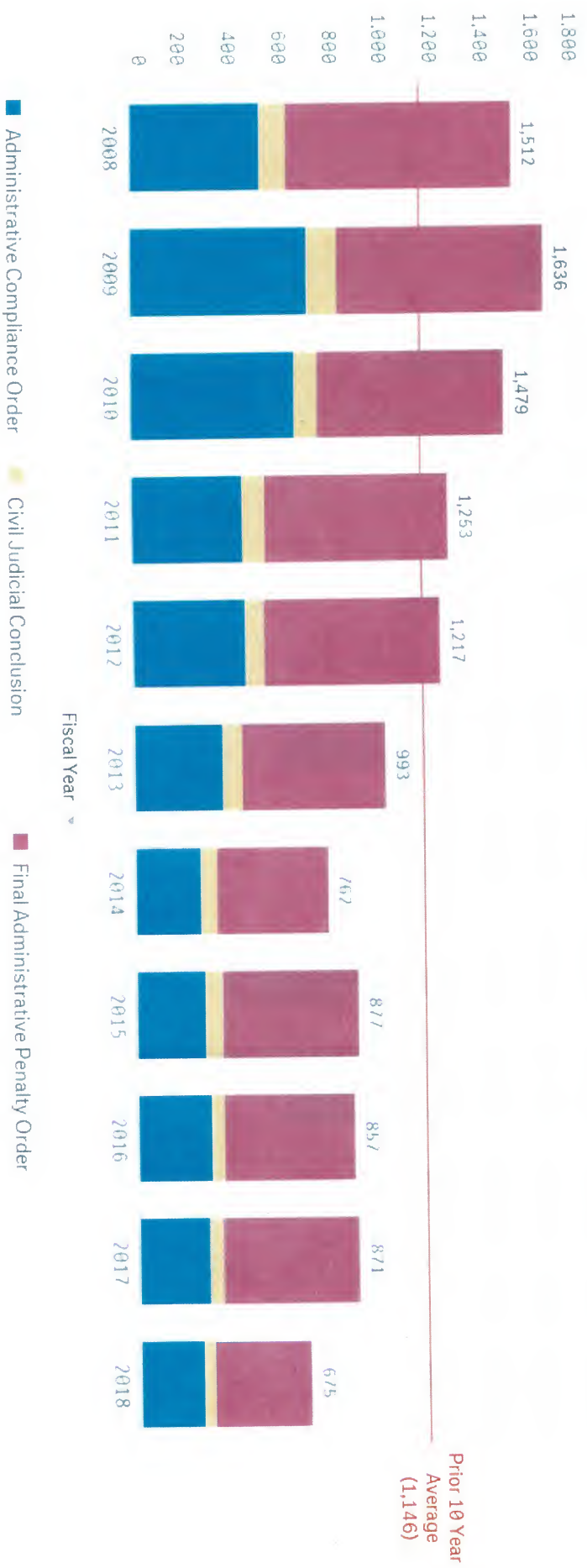
Total Initiations by Region: Mid-Year to Mid-Year Comparison



## Civil Judicial Referrals by Region: Mid-Year to Mid-Year Comparison

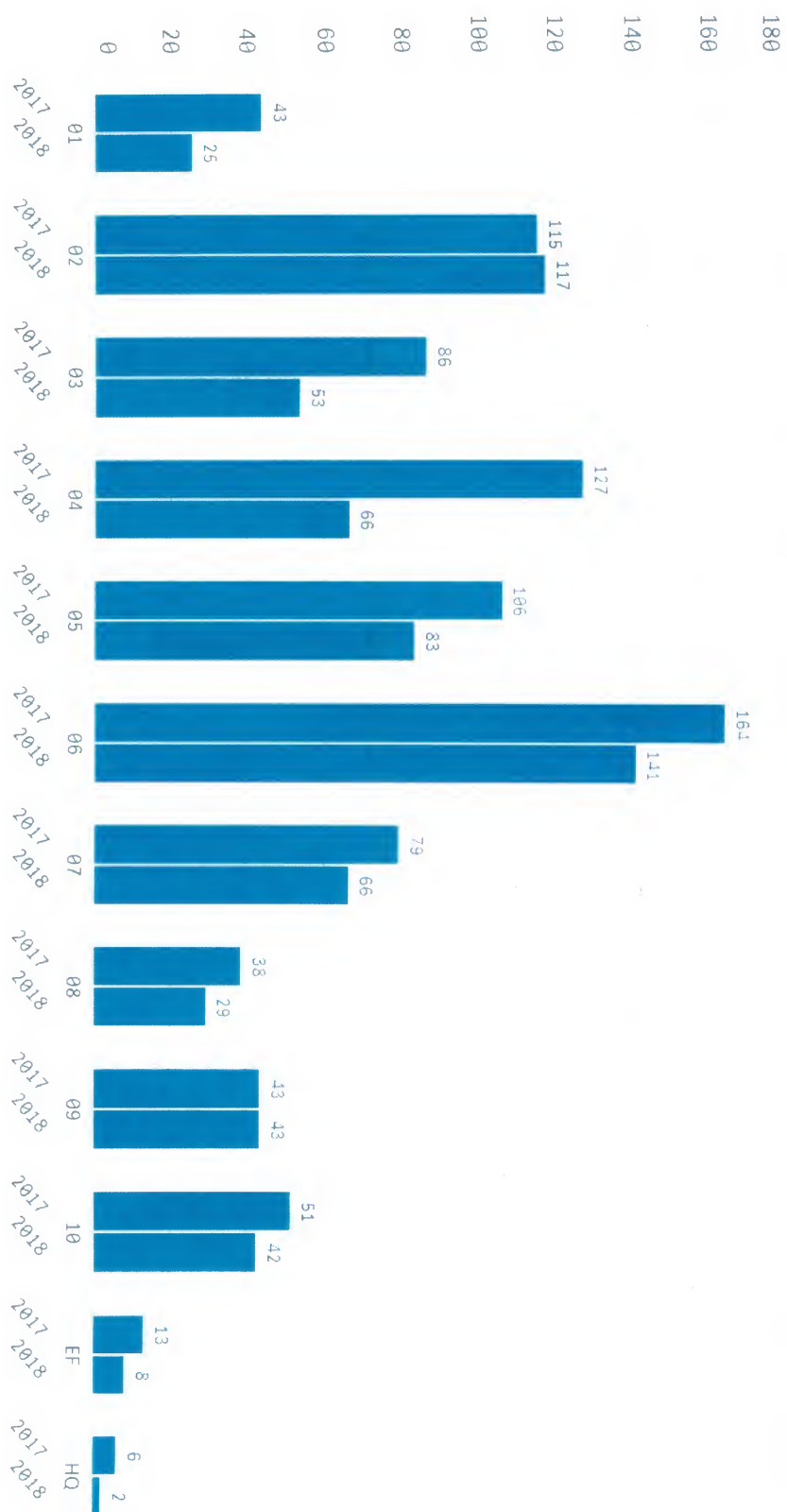


## Total Conclusions by Year: Mid-Year to Mid-Year Comparison

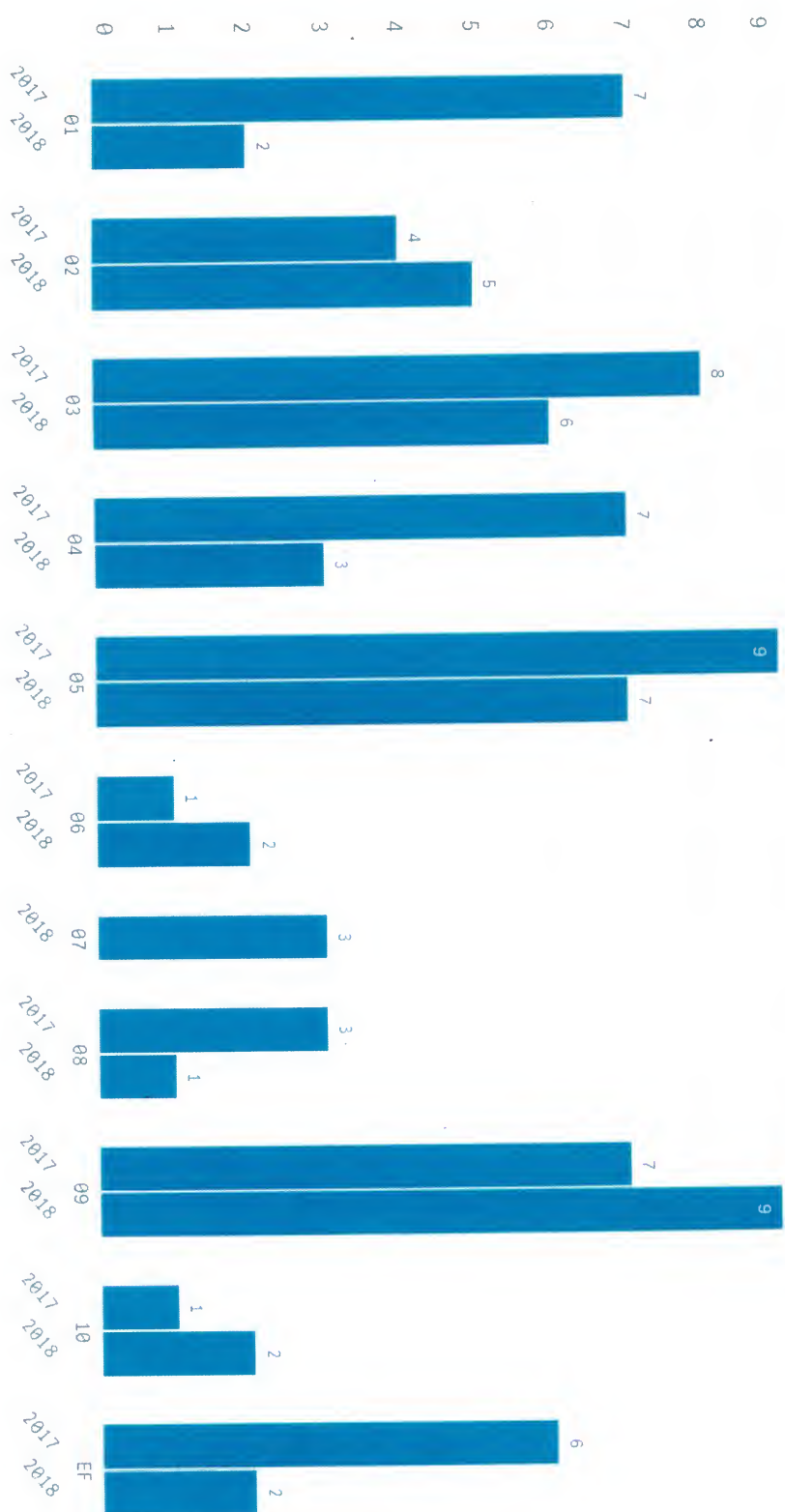




Total Conclusions by Region: Mid-Year to Mid-Year Comparison

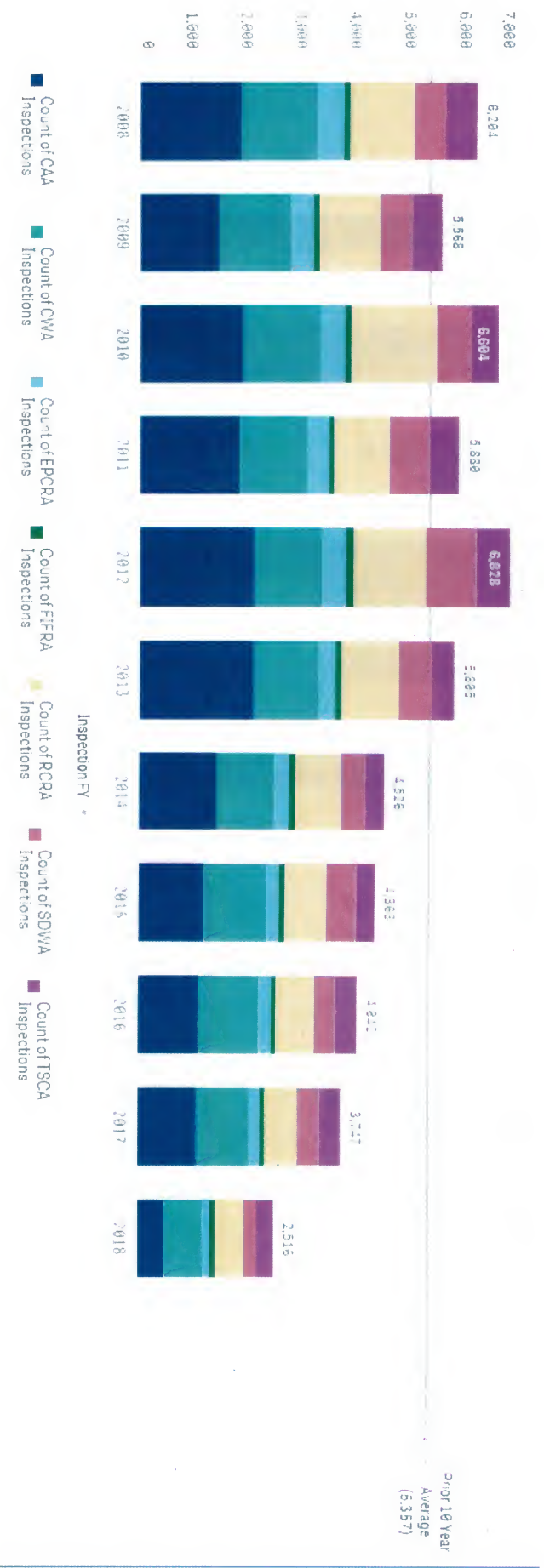


Civil Judicial Conclusions by Region: Mid-Year to Mid-Year Comparison

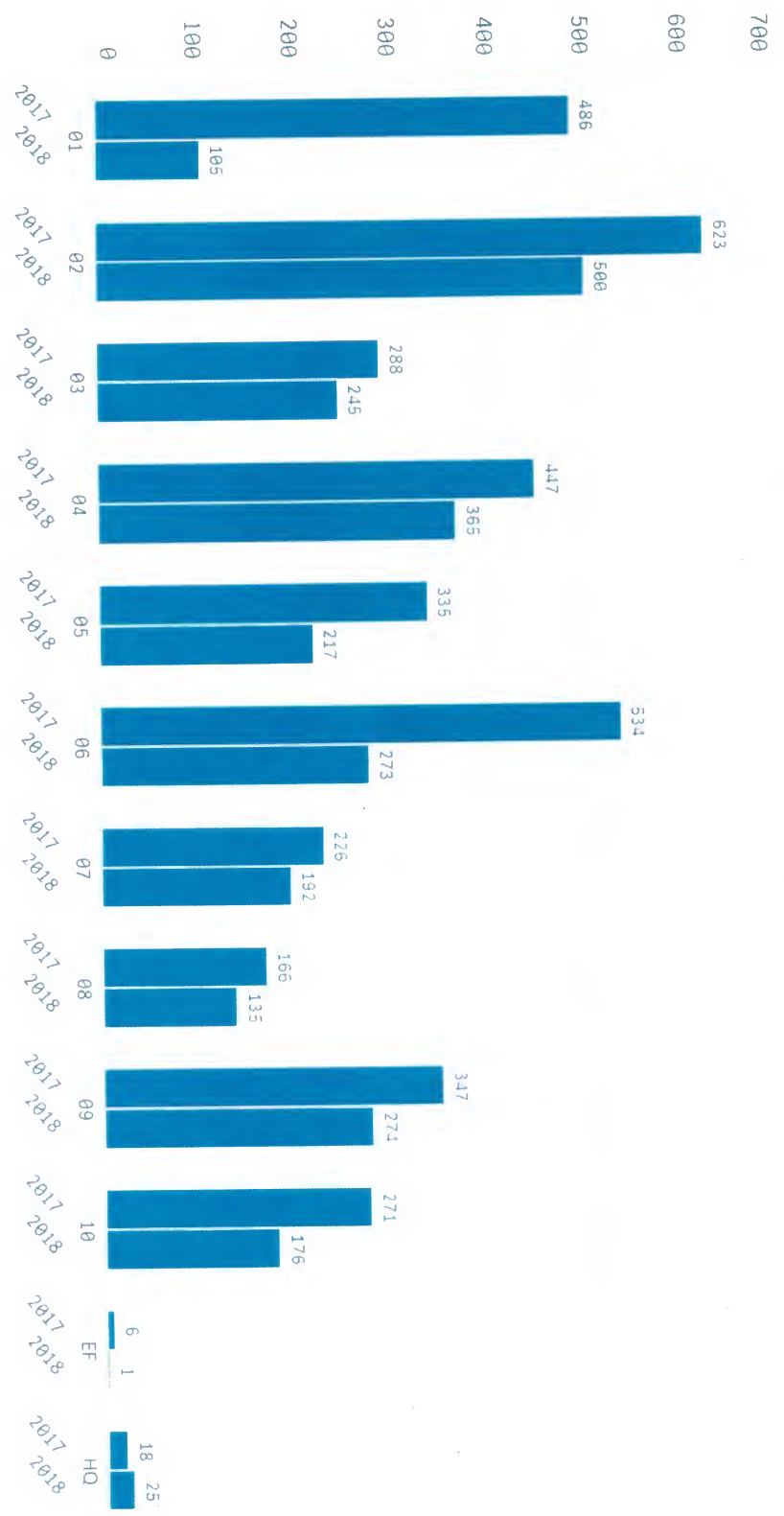




## Inspections by Year: Mid-Year to Mid-Year Comparison



## Inspections by Region: Mid-Year to Mid-Year Comparison



Total Enforcement Initiations Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	66	61	-5	-7.58%
CWA 404	23	19	-4	-17.39%
CAA Stationary Source	69	33	-36	-52.17%
CWA NPDES	179	115	-64	-35.75%
RCRA HW	53	44	-9	-16.98%
CWA 311	57	43	-14	-24.56%
EPCRA 313	20	13	-7	-35.00%
FIFRA	76	47	-29	-38.16%
TSCA	53	38	-15	-28.30%
CAA 112r	80	56	-24	-30.00%
SDWA PWS	49	81	32	65.31%
EPCRA non 313	30	22	-8	-26.67%
RCRA UST	63	54	-9	-14.29%
RCRA CA	3	0	-3	-100.00%
CAA Mobile Source	20	18	-2	-10.00%
SDWA UIC	10	8	-2	-20.00%
APPS Mobile Source	1	0	-1	-100.00%
<b>Totals</b>	<b>852</b>	<b>652</b>	<b>-200</b>	<b>-23.47%</b>

Total Enforcement Initiations Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	34	25	-9	-26.47%
Region 2	120	113	-7	-5.83%
Region 3	80	48	-32	-40.00%
Region 4	125	64	-61	-48.80%
Region 5	105	82	-23	-21.90%
Region 6	156	141	-15	-9.62%
Region 7	83	70	-13	-15.66%
Region 8	45	21	-24	-53.33%
Region 9	41	37	-4	-9.76%
Region 10	51	39	-12	-23.53%
HQ	12	12	0	0.00%
<b>Totals</b>	<b>852</b>	<b>652</b>	<b>-200</b>	<b>-23.47%</b>

Administrative Enforcement Initiations Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	47	48	1	2.13%
CWA 404	22	16	-6	-27.27%
CAA Stationary Source	57	27	-30	-52.63%
CWA NPDES	174	113	-61	-35.06%
RCRA HW	52	41	-11	-21.15%
CWA 311	55	42	-13	-23.64%
EPCRA 313	20	13	-7	-35.00%
FIFRA	76	47	-29	-38.16%
TSCA	53	37	-16	-30.19%
CAA 112r	76	55	-21	-27.63%
SDWA PWS	48	81	33	68.75%
EPCRA non 313	30	22	-8	-26.67%
RCRA UST	63	54	-9	-14.29%
RCRA CA	2	0	-2	-100.00%
CAA Mobile Source	16	15	-1	-6.25%
SDWA UIC	10	5	-5	-50.00%
APPS Mobile Source	1	0	-1	-100.00%
<b>Totals</b>	<b>802</b>	<b>616</b>	<b>-186</b>	<b>-23.19%</b>

Administrative Enforcement Initiations Change Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	32	23	-9	-28.13%
Region 2	116	111	-5	-4.31%
Region 3	77	46	-31	-40.26%
Region 4	121	63	-58	-47.93%
Region 5	97	76	-21	-21.65%
Region 6	151	137	-14	-9.27%
Region 7	80	63	-17	-21.25%
Region 8	35	15	-20	-57.14%
Region 9	37	34	-3	-8.11%
Region 10	48	39	-9	-18.75%
HQ	8	9	1	12.50%
<b>Totals</b>	<b>802</b>	<b>616</b>	<b>-186</b>	<b>-23.19%</b>

Civil Judicial Referrals Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	19	13	-6	-31.58%
CWA 404	1	3	2	200.00%
CAA Stationary Source	12	6	-6	-50.00%
CWA NPDES	5	2	-3	-60.00%
RCRA HW	1	3	2	200.00%
CWA 311	2	1	-1	-50.00%
EPCRA 313	0	0	0	-
FIFRA	0	0	0	-
TSCA	0	1	1	100.00%
CAA 112r	4	1	-3	-75.00%
SDWA PWS	1	0	-1	-100.00%
EPCRA non 313	0	0	0	-
RCRA UST	0	0	0	-
RCRA CA	1	0	-1	-100.00%
CAA Mobile Source	4	3	-1	-25.00%
SDWA UIC	0	3	3	100.00%
APPS Mobile Source	0	0	0	-
<b>Totals</b>	<b>50</b>	<b>36</b>	<b>-14</b>	<b>-28.00%</b>

Civil Judicial Referrals Change Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	2	2	0	0.00%
Region 2	4	2	-2	-50.00%
Region 3	3	2	-1	-33.33%
Region 4	4	1	-3	-75.00%
Region 5	8	6	-2	-25.00%
Region 6	5	4	-1	-20.00%
Region 7	3	7	4	133.33%
Region 8	10	6	-4	-40.00%
Region 9	4	3	-1	-25.00%
Region 10	3	0	-3	-100.00%
HQ	4	3	-1	-25.00%
<b>Totals</b>	<b>50</b>	<b>36</b>	<b>-14</b>	<b>-28.00%</b>



Total Enforcement Conclusions Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	67	66	-1	-1.49%
CWA 404	26	15	-11	-42.31%
CAA Stationary Source	64	40	-24	-37.50%
CWA NPDES	189	118	-71	-37.57%
RCRA HW	57	44	-13	-22.81%
CWA 311	55	43	-12	-21.82%
EPCRA 313	22	13	-9	-40.91%
FIFRA	77	54	-23	-29.87%
TSCA	53	43	-10	-18.87%
CAA 112r	76	55	-21	-27.63%
SDWA PWS	54	81	27	50.00%
EPCRA non 313	30	23	-7	-23.33%
RCRA UST	65	57	-8	-12.31%
RCRA CA	2	0	-2	-100.00%
CAA Mobile Source	25	16	-9	-36.00%
SDWA UIC	8	7	-1	-12.50%
APPS Mobile Source	1	0	-1	-100.00%
<b>Totals</b>	<b>871</b>	<b>675</b>	<b>-196</b>	<b>-22.50%</b>

Total Enforcement Conclusions Change (Judicial & Administrative) Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	43	25	-18	-41.86%
Region 2	115	117	2	1.74%
Region 3	86	53	-33	-38.37%
Region 4	127	66	-61	-48.03%
Region 5	106	83	-23	-21.70%
Region 6	164	141	-23	-14.02%
Region 7	79	66	-13	-16.46%
Region 8	38	29	-9	-23.68%
Region 9	43	43	0	0.00%
Region 10	51	42	-9	-17.65%
HQ	19	10	-9	-47.37%
<b>Totals</b>	<b>871</b>	<b>675</b>	<b>-196</b>	<b>-22.50%</b>

Administrative Enforcement Conclusions Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	47	48	1	2.13%
CWA 404	22	14	-8	-36.36%
CAA Stationary Source	55	28	-27	-49.09%
CWA NPDES	180	114	-66	-36.67%
RCRA HW	55	42	-13	-23.64%
CWA 311	54	43	-11	-20.37%
EPCRA 313	22	13	-9	-40.91%
FIFRA	77	54	-23	-29.87%
TSCA	52	43	-9	-17.31%
CAA 112r	76	54	-22	-28.95%
SDWA PWS	54	81	27	50.00%
EPCRA non 313	30	23	-7	-23.33%
RCRA UST	64	55	-9	-14.06%
RCRA CA	2	0	-2	-100.00%
CAA Mobile Source	19	14	-5	-26.32%
SDWA UIC	8	7	-1	-12.50%
APPS Mobile Source	1	0	-1	-100.00%
<b>Totals</b>	<b>818</b>	<b>633</b>	<b>-185</b>	<b>-22.62%</b>

Administrative Enforcement Conclusions Change Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	36	23	-13	-36.11%
Region 2	111	112	1	0.90%
Region 3	78	47	-31	-39.74%
Region 4	120	63	-57	-47.50%
Region 5	97	76	-21	-21.65%
Region 6	163	139	-24	-14.72%
Region 7	79	63	-16	-20.25%
Region 8	35	28	-7	-20.00%
Region 9	36	34	-2	-5.56%
Region 10	50	40	-10	-20.00%
HQ	13	8	-5	-38.46%
<b>Totals</b>	<b>818</b>	<b>633</b>	<b>-185</b>	<b>-22.62%</b>

Judicial Enforcement Conclusions Change Mid-Year FY 17 to Mid-Yer FY 18 National Results by Program				
Programs	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
CERCLA	20	18	-2	-10.00%
CWA 404	4	1	-3	-75.00%
CAA Stationary Source	9	12	3	33.33%
CWA NPDES	9	4	-5	-55.56%
RCRA HW	2	2	0	0.00%
CWA 311	1	0	-1	-100.00%
EPCRA 313	0	0	0	-
FIFRA	0	0	0	-
TSCA	1	0	-1	-100.00%
CAA 112r	0	1	1	100.00%
SDWA PWS	0	0	0	-
EPCRA non 313	0	0	0	-
RCRA UST	1	2	1	100.00%
RCRA CA	0	0	0	-
CAA Mobile Source	6	2	-4	-66.67%
SDWA UIC	0	0	0	-
APPS Mobile Source	0	0	0	-
<b>Totals</b>	<b>53</b>	<b>42</b>	<b>-11</b>	<b>-20.75%</b>

Judicial Enforcement Conclusions Change Mid-Year FY 17 to Mid-Yer FY 18 by Region				
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18
Region 1	7	2	-5	-71.43%
Region 2	4	5	1	25.00%
Region 3	8	6	-2	-25.00%
Region 4	7	3	-4	-57.14%
Region 5	9	7	-2	-22.22%
Region 6	1	2	1	100.00%
Region 7	0	3	3	100.00%
Region 8	3	1	-2	-66.67%
Region 9	7	9	2	28.57%
Region 10	1	2	1	100.00%
HQ	6	2	-4	-66.67%
<b>Totals</b>	<b>53</b>	<b>42</b>	<b>-11</b>	<b>-20.75%</b>

**Total Enforcement Conclusions Change (Judicial & Administrative)**

Mid-Year FY 17 to Mid-Year FY 18 by Program

Region 1				Region 2				Region 3				Region 4				Region 5			
Programs	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017
CERCLA	2	4	100.00%	9	13	44.44%	9	4	-55.56%	13	7	-46.15%	13	12	-7.69%	13	12	-7.69%	13
CWA 404	3	1	-66.67%	2	0	-100.00%	5	3	-40.00%	0	4	400.00%	0	2	0.00%	2	2	0.00%	2
CAA Stationary Source	3	5	66.67%	1	1	0.00%	5	5	0.00%	15	7	-53.33%	29	10	-65.52%	29	10	-65.52%	29
CWA NPDES	10	6	-40.00%	46	26	-43.48%	10	7	-30.00%	19	1	-94.74%	6	12	100.00%	6	12	100.00%	6
RCRA HW	3	0	-100.00%	2	2	0.00%	7	5	-28.57%	5	3	-40.00%	7	7	0.00%	7	7	0.00%	7
CWA 311	2	2	0.00%	4	0	-100.00%	5	5	0.00%	1	3	200.00%	2	1	-50.00%	2	1	-50.00%	2
EPCRA 313	2	1	-50.00%	0	0	-	3	0	-100.00%	7	5	-28.57%	2	2	0.00%	2	2	0.00%	2
FIFRA	5	0	-100.00%	2	0	-100.00%	3	0	-100.00%	0	3	300.00%	0	3	300.00%	0	3	300.00%	0
CAA 1117	4	4	0.00%	6	4	-33.33%	4	8	100.00%	12	3	-75.00%	13	20	53.85%	13	20	53.85%	13
SDWA PWS	0	1	-	0	0	-	11	6	-45.45%	11	3	-72.73%	6	2	-66.67%	6	2	-66.67%	6
EPCRA non 313	1	0	-100.00%	0	0	-	6	2	-66.67%	12	10	-16.67%	9	5	-44.44%	9	5	-44.44%	9
RCRA UST	4	1	-75.00%	31	27	-12.90%	2	2	0.00%	7	8	14.29%	6	6	0.00%	6	6	0.00%	6
RCRA CA	0	0	-	0	0	-	0	0	-	0	0	-	0	0	-	0	0	-	0
CAA Mobile Source	0	0	-	1	0	-100.00%	0	0	-	0	0	-	0	0	-	0	0	-	0
SDWA UIC	0	0	-	0	0	-	1	0	-100.00%	0	0	-	0	0	-	1	0	-100.00%	1
Apps Mobile Source	0	0	-	0	0	-	0	0	-	5	0	-100.00%	0	0	-	0	0	-	0
<b>Totals</b>	<b>43</b>	<b>25</b>	<b>-41.86%</b>	<b>115</b>	<b>117</b>	<b>1.74%</b>	<b>86</b>	<b>53</b>	<b>-38.37%</b>	<b>127</b>	<b>66</b>	<b>-48.03%</b>	<b>106</b>	<b>83</b>	<b>-21.70%</b>	<b>106</b>	<b>83</b>	<b>-21.70%</b>	<b>106</b>
Region 6				Region 7				Region 8				Region 9				Region 10			
Programs	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017	2018	Percent Change MY FY17 to MY FY18	2017
CERCLA	2	2	0.00%	3	5	66.67%	4	5	25.00%	10	12	20.00%	2	2	0.00%	2	2	0.00%	2
CWA 404	3	1	-66.67%	3	2	-33.33%	3	0	-100.00%	2	0	-100.00%	3	2	-33.33%	3	2	-33.33%	3
CAA Stationary Source	4	2	-50.00%	0	1	100.00%	2	2	0.00%	5	2	-60.00%	0	5	500.00%	0	5	500.00%	0
CWA NPDES	58	39	-32.76%	14	15	7.14%	8	3	-62.50%	6	5	-16.67%	12	4	-66.67%	12	4	-66.67%	12
RCRA HW	23	19	-17.39%	4	6	50.00%	1	0	-100.00%	0	1	100.00%	5	1	-80.00%	5	1	-80.00%	5
CWA 311	20	17	-15.00%	21	7	-66.67%	2	3	50.00%	1	5	400.00%	1	0	-100.00%	1	0	-100.00%	1
EPCRA 313	4	6	50.00%	0	0	-	0	0	-	0	0	-	0	0	-	0	0	-	0
FIFRA	3	3	0.00%	11	4	-63.64%	3	4	33.33%	0	0	-	0	0	-	0	0	-	0
CAA 1117	0	0	-	12	10	-16.67%	0	3	25.00%	2	10	400.00%	5	4	-20.00%	5	4	-20.00%	5
SDWA PWS	24	17	-29.17%	9	12	33.33%	0	0	-	1	0	-100.00%	4	4	0.00%	4	4	0.00%	4
EPCRA non 313	0	0	-	1	0	-100.00%	10	7	-30.00%	2	1	-50.00%	2	5	150.00%	2	5	150.00%	2
RCRA UST	0	0	-	0	1	100.00%	0	1	100.00%	0	0	-	0	0	-	0	0	-	0
RCRA CA	0	0	-	1	3	200.00%	0	1	100.00%	0	0	-	0	0	-	14	9	-35.71%	14
CAA Mobile Source	0	0	-	0	0	-	0	0	-	0	0	-	0	0	-	0	0	-	0
SDWA UIC	0	0	-	0	0	-	0	0	-	0	0	-	0	0	-	0	0	-	0
Apps Mobile Source	0	6	100.00%	0	0	-	1	0	-100.00%	0	1	100.00%	0	1	100.00%	0	1	100.00%	0
<b>Totals</b>	<b>164</b>	<b>141</b>	<b>-14.02%</b>	<b>79</b>	<b>66</b>	<b>-16.46%</b>	<b>38</b>	<b>29</b>	<b>-23.68%</b>	<b>43</b>	<b>43</b>	<b>0.00%</b>	<b>51</b>	<b>42</b>	<b>-17.65%</b>	<b>51</b>	<b>42</b>	<b>-17.65%</b>	<b>51</b>
HQ																			
Programs	2017	2018	Percent Change MY FY17 to MY FY18																
CERCLA	0	0	-																
CWA 404	0	0	-																
CAA Stationary Source	0	0	-																
CWA NPDES	0	0	-																
RCRA HW	0	0	-																
CWA 311	0	0	-																
EPCRA 313	0	0	-																
FIFRA	4	0	-100.00%																
CAA 1117	2	2	0.00%																
SDWA PWS	0	0	-																
EPCRA non 313	0	0	-																
RCRA UST	0	0	-																
RCRA CA	0	0	-																
CAA Mobile Source	12	8	-33.33%																
SDWA UIC	0	0	-																
Apps Mobile Source	1	0	-100.00%																

Total Compliance Inspections Change (All Regions) Mid-Year FY 17 to Mid-Year FY 18 National Results by Program					
Program	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18	
CAA 112(r)	181	106	-75	-41.44%	
CAA Asbestos Demolition and Renovation	20	4	-16	-80.00%	
CAA Mobile Sources	137	99	-38	-27.74%	
CAA Stationary Source FCEs	54	62	8	14.81%	
CAA Stationary Source PCEs	690	221	-469	-67.97%	
CWA 311 FRP	77	54	-23	-29.87%	
CWA 311 SPCC	241	125	-116	-48.13%	
CWA 311 Spill	3	1	-2	-66.67%	
CWA Pretreatment IUs	34	47	13	38.24%	
CWA Section 404 Wetlands	70	57	-13	-18.57%	
EPCRA 313 Data Quality	10	6	-4	-40.00%	
EPCRA 313 non Data Quality	60	48	-12	-20.00%	
EPCRA non 313	111	73	-38	-34.23%	
FIFRA (non GLP)	79	87	8	10.13%	
FIFRA Good Laboratory Practices	27	28	1	3.70%	
NPDES Majors	112	112	0	0.00%	
NPDES Minors	419	291	-128	-30.55%	
Pretreatment POTWs	21	20	-1	-4.76%	
RCRA HW	368	358	-10	-2.72%	
RCRA UST	227	163	-64	-28.19%	
SDWA PWSS Inspection	69	17	-52	-75.36%	
SDWA UIC Inspection	337	217	-120	-35.61%	
TSCA AHERA	8	10	2	25.00%	
TSCA Core	29	21	-8	-27.59%	
TSCA Lead	338	275	-63	-18.64%	
TSCA PCBs	25	17	-8	-32.00%	
<b>Totals</b>	<b>3747</b>	<b>2508</b>	<b>-1239</b>	<b>-33.07%</b>	

Total Compliance Inspections Change Mid-Year FY 17 to Mid-Year FY 18 by Region					
Region	2017	2018	Change MY FY17 to MY FY 18	Percent Change MY FY17 to MY FY18	
Region 1	486	105	-381	-78.40%	
Region 2	623	500	-123	-19.74%	
Region 3	288	245	-43	-14.93%	
Region 4	447	365	-82	-18.34%	
Region 5	335	217	-118	-35.22%	
Region 6	534	273	-261	-48.88%	
Region 7	226	192	-34	-15.04%	
Region 8	166	135	-31	-18.67%	
Region 9	347	274	-73	-21.04%	
Region 10	271	176	-95	-35.06%	
HQ	24	26	2	8.33%	
<b>Totals</b>	<b>3747</b>	<b>2508</b>	<b>-1239</b>	<b>-33.07%</b>	



Compliance Inspections Change  
Mid-Year FY 17 to Mid-Year FY 18

Program	Region 1			Region 2			Region 3			Region 4			Region 5		
	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18
CAA 112(f)	9	2	-7	14	6	-8	28	30	2	17	9	-8	13	9	-4
CAA Asbestos Demolition and Renovation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CAA Mobile Sources	0	0	0	1	0	-1	9	0	-9	0	2	-7	0	0	0
CAA Stationary Source FCEs	7	4	-3	10	18	8	33	16	-17	0	0	0	0	4	4
CAA Stationary Source FCEs	348	27	-321	23	40	17	10	20	10	18	10	-8	155	100	-55
CAA 311 FBP	6	3	-3	13	4	-9	12	7	-5	4	3	-1	1	0	-1
CAA 311 SPCC	21	11	-10	28	9	-19	6	8	-2	19	18	-1	0	0	0
CAA 311 Spill	0	0	0	0	0	0	0	0	0	24	28	4	9	3	-6
CAA Pretreatment IUs	4	4	0	0	0	0	0	0	0	0	0	0	0	0	0
CAA Section 304 Wetlands	3	3	0	8	8	0	3	0	-3	0	1	1	0	2	2
EPFCA 313 Data Quality	0	0	0	6	2	-4	21	15	-6	11	2	-9	3	2	-1
EPFCA 313 non Data Quality	4	5	1	9	10	1	9	7	-2	1	2	1	0	1	1
EPFCA 313 non Data Quality	9	0	-9	21	18	-3	8	5	-3	22	15	-7	16	7	-9
FIRPA Good Laboratory Practices	0	2	2	0	18	18	17	15	-2	30	19	-11	16	7	-9
NPDES Majors	12	4	-8	50	56	6	9	0	-9	5	7	2	5	5	0
NPDES Minors	33	32	-1	122	68	-53	2	1	-1	0	0	0	0	0	0
Pretreatment POTWs	2	0	-2	6	1	-5	5	17	12	41	22	-19	4	9	-5
RCRA HW	7	0	-7	6	1	-5	3	5	2	0	5	5	1	0	-1
SDWA PWS Inspection	8	2	-6	82	57	-25	13	7	-6	115	108	-7	37	28	-9
SDWA UIC Inspection	0	0	0	8	4	-4	1	0	-1	23	9	-14	24	36	12
TS/CA AFRA	0	0	0	70	30	-40	23	18	-5	0	0	0	0	0	0
TS/CA Core	0	0	0	0	0	0	3	2	-1	5	7	2	35	0	-35
TS/CA Lead	9	4	-5	53	49	-4	37	41	4	79	61	-18	23	8	-15
TS/CA PCBs	4	2	-2	10	4	-6	3	2	-1	5	9	4	3	0	-3
Totals	486	105	-381	623	500	-123	288	245	-43	447	365	-82	335	217	-118

Compliance Inspections Change  
Mid-Year FY 17 to Mid-Year FY 18

Program	Region 6			Region 7			Region 8			Region 9			Region 10			Region HQ		
	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18	2017	2018	Change MY FY17 to MY FY 18
CAA 112(f)	61	18	-43	18	13	-5	6	5	-1	15	8	-7	0	6	6	0	0	0
CAA Asbestos Demolition and Renovation	0	0	0	0	0	0	0	0	0	0	0	0	1	2	1	0	0	0
CAA Mobile Sources	0	0	0	0	0	0	0	0	0	96	71	-25	2	3	1	6	1	-5
CAA Stationary Source FCEs	69	11	-58	20	15	-5	0	0	0	0	0	0	2	2	0	0	0	0
CAA Stationary Source FCEs	22	14	-8	7	1	-6	42	18	-24	1	0	-1	15	7	-8	0	0	0
CAA 311 FBP	87	42	-45	0	0	0	0	1	-1	6	2	-4	5	5	0	0	0	0
CAA 311 SPCC	0	0	0	14	4	-10	10	1	-9	20	4	-16	8	15	7	0	0	0
CAA 311 Spill	0	0	0	0	0	0	3	0	-3	0	0	0	0	0	0	0	0	0
CAA Pretreatment IUs	0	7	7	0	0	0	0	1	1	0	4	0	0	0	0	0	0	0
CAA Section 304 Wetlands	8	18	10	0	1	1	5	6	1	7	13	6	0	0	0	0	0	0
EPFCA 313 Data Quality	1	0	-1	4	1	-1	1	0	0	4	3	-1	13	10	-3	0	0	0
EPFCA 313 non Data Quality	4	0	-4	1	4	3	0	2	-2	1	0	-1	0	3	3	0	0	0
EPFCA 313 non Data Quality	4	0	-4	4	4	0	1	2	1	0	0	0	1	4	3	0	0	0
FIRPA (non GUP)	0	0	0	0	0	0	7	5	-2	13	8	-5	7	11	4	0	0	0
FIRPA Good Laboratory Practices	6	6	0	22	6	-16	0	0	0	13	19	6	2	1	-1	0	0	0
NPDES Majors	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NPDES Minors	19	23	4	11	4	-7	0	0	0	3	7	4	0	0	0	0	0	0
Pretreatment POTWs	76	73	-3	44	30	-14	15	1	-14	32	17	-15	48	22	-26	0	0	0
RCRA HW	8	1	-7	64	82	18	2	4	2	17	16	-1	14	12	-2	0	0	0
SDWA PWS Inspection	0	0	0	8	6	-2	0	0	0	0	7	-7	0	0	0	0	0	0
SDWA UIC Inspection	157	41	-116	0	0	0	20	14	-6	57	5	-52	46	23	-23	0	0	0
TS/CA AFRA	0	0	0	0	0	0	3	0	-3	0	48	43	0	0	0	0	0	0
TS/CA Core	0	0	0	0	0	0	1	57	56	12	9	-3	0	0	0	0	0	0
TS/CA Lead	5	0	-5	22	27	5	0	0	0	45	37	-8	0	0	0	0	0	0
TS/CA PCBs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	534	273	-261	226	192	-34	166	135	-31	347	274	-73	271	176	-95	24	26	2

Program	Region HQ		
	2017	2018	Change MY FY17 to MY FY 18
CAA 112(f)	0	0	0
CAA Asbestos Demolition and Renovation	0	0	0
CAA Mobile Sources	0	0	0
CAA Stationary Source FCEs	6	1	-5
CAA Stationary Source FCEs	0	0	0
CAA 311 FBP	0	0	0
CAA 311 SPCC	0	0	0
CAA 311 Spill	0	0	0
CAA Pretreatment IUs	0	0	0
CAA Section 304 Wetlands	0	0	0
EPFCA 313 Data Quality	0	0	0
EPFCA 313 non Data Quality	0	0	0
EPFCA 313 non Data Quality	0	0	0
FIRPA (non GUP)	0	0	0
FIRPA Good Laboratory Practices	0	0	0
NPDES Majors	0	0	0
NPDES Minors	0	0	0
Pretreatment POTWs	0	0	0
RCRA HW	0	0	0
SDWA PWS Inspection	0	0	0
SDWA UIC Inspection	0	0	0
TS/CA AFRA	0	0	0
TS/CA Core	0	0	0
TS/CA Lead	0	0	0
TS/CA PCBs	0	0	0
Totals	24	26	2

